

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AT&T CORP.,

Petitioner,

v.

TELNYX LLC,

Respondent.

Case No. 23-CV-01807

Hon. Judge Elaine E. Bucklo

**RESPONDENTS'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PETITIONER'S MOTION TO COMPEL AND TO TRANSFER**

Respondent, TELNYX LLC (“Telnyx”) by through their attorneys ELLIS LEGAL, P.C., and for their Motion for Extension of Time to Respond to Petitioner’s Motion to Compel and to Transfer Pursuant to Rule 45(f), states as follows:

1. On March 22, 2023, Petitioner initiated this action by filing its Motion to Compel Production of Documents Pursuant to a Non-Party Subpoena and Motion to Transfer Pursuant to Rule 45(f) with the United States District Court for the Northern District of Illinois (Dkt #1, #4).
2. The underlying litigation, *Core Communications, Inc., et al. v. AT&T Corp.*, Case No. 2:21-cv-02771-JDW, is proceeding in the Eastern District of Pennsylvania on June 22, 2021.
3. On April 3, 2023, the Court entered a briefing schedule on Petitioner’s Motion to Compel, ordering Respondent Telnyx to file their response to the Motion to Transfer by April 21, 2023 (Dkt #10).
4. Telnyx only recently engaged the undersigned counsel on April 17, 2023. Thus, Telnyx is requesting this extension of time to allow its counsel an adequate opportunity to gather the information necessary to prepare its response.

5. Petitioner and Respondent have been actively engaged in attempting to resolve Petitioner's Motion and have a good faith basis to believe, with the additional time requested by this motion, that the parties will reach an accord.

6. Accordingly, Telnyx is requesting an extension up to and including May 5, 2023, to file its response to Petitioner's Motion to Compel and Transfer.

7. Respondent has contacted Petitioner and Petitioner does not oppose this Motion.

8. This motion is filed in good faith and with no intent of delaying this matter.

WHEREFORE, for the foregoing reasons, Respondent Telnyx respectfully requests an extension of time until May 5, 2023, to respond to Petitioner's Motion to Compel and Motion to Transfer,

Dated: April 19, 2023

Respectfully submitted,

By: /s/ John C. Ellis
One of Telnyx's Attorneys

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